

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. ____

**ORDER SUSTAINING DEBTORS' OBJECTION TO PROOFS OF CLAIM
FILED BY THE JOINT LIQUIDATORS OF THREE ARROWS CAPITAL LTD.**

Upon the objection (the “Objection”) of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) disallowing and expunging in their entirety from the claims register the proofs of claim set forth in Schedule 1 attached hereto (the “3AC Claims”), pursuant to section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) and rule 3007 of the Federal Rules of Bankruptcy Procedure (“Bankruptcy Rules”); and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and upon consideration of the Objection; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

accordance with the Bankruptcy Rules, the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the District of Delaware (the “Local Rules”), and that, except as otherwise ordered herein, no other or further notice is necessary; and any replies (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and upon the record of any hearing held to consider the relief requested in the Objection; and this Court having found and determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is GRANTED as set forth herein.
2. The 3AC Claims set forth in Schedule 1 are disallowed and expunged in their entirety.
3. Kroll Restructuring Administration LLC, as the Debtors’ claims and administrative agent, is authorized and directed to update the claims register maintained in these Chapter 11 Cases to reflect the relief granted in this Order.
4. The Debtors have provided a notice to counsel for the joint liquidators and foreign representatives of Three Arrows Capital Ltd. that complies with the notice and service procedures set forth in the Bankruptcy Rules and the Local Rules.
5. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (i) an admission as to the validity of any claim against the Debtors; (ii) a waiver of the Debtors’ rights to dispute any claim on any grounds; (iii) a promise or requirement to pay any claim; (iv) an implication or admission that any particular claim is of a type specified or defined in this Objection or any order granting the relief requested by this Objection; (v) an approval or assumption of any agreement, contract or lease

under section 365 of the Bankruptcy Code; or (vi) a waiver of the Debtors' rights under the Bankruptcy Code or any other applicable law.

6. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover is preserved.

7. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon its entry.

8. The Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order.

9. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation and enforcement of this Order.

Dated: _____, 2024
Wilmington, Delaware

THE HONORABLE JOHN T. DORSEY
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1**3AC Proofs of Claim¹**

Claim Number	Debtor	Creditor	Filing Date
5120	Crypto Bahamas LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5121	Alameda Research Yankari Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5125	Alameda Research (Bahamas) Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5145	Western Concord Enterprises Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5147	FTX Certificates GmbH	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5148	Alameda Global Services Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5151	FTX Products (Singapore) Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5152	Verdant Canyon Capital LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5154	Quoine India Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5155	DAAG Trading, DMCC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5156	Ledger Holdings Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5158	Quoine Vietnam Co. Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5159	Alameda Research KK	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5160	Clifton Bay Investments Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5167	West Realm Shires Services Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5168	Alameda Aus Pty Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5169	FTX Japan K.K.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5170	Good Luck Games, LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023

¹ Claim Nos. 5147, 5151, 5154, 5155, 5158, 5168, 5178, 5180, 5184, 5185, 5187, 5189, 5191, 5194, 5204, 5355, 5444, 5473 and 5581 have already been expunged as a result of the dismissal of the applicable Debtor's chapter 11 case.

5171	Cardinal Ventures Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5172	FTX Digital Holdings (Singapore) Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5173	Alameda Research Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5175	Killarney Lake Investments Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5176	Alameda TR Systems S. de R. L.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5177	Pioneer Street Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5178	Liquid Financial USA Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5179	Hive Empire Trading Pty Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5180	Innovatia Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5181	Maclaurin Investments Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5182	LedgerPrime Digital Asset Opportunities Fund, LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5183	Bancroft Way Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5184	FTX Switzerland GmbH	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5185	FTX Japan Services KK	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5186	Cedar Bay Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5187	FTX Exchange FZE	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5188	West Realm Shires Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5189	FTX Trading GmbH	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5190	FTX Zuma Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5191	Liquid Securities Singapore Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5192	FTX Europe AG	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5194	LiquidEX LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023

5195	FTX Canada Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5196	Blue Ridge Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5197	Goodman Investments Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5198	Island Bay Ventures Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5199	Deep Creek Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5200	Cottonwood Technologies Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5201	Clifton Bay Investments LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5203	LedgerPrime Digital Asset Opportunities Master Fund LP	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5204	Analisyia Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5238	Strategy Ark Collective Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5239	Hawaii Digital Assets Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5253	Global Compass Dynamics Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5262	LedgerPrime Bitcoin Yield Enhancement Master Fund LP	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5269	FTX US Services, Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5306	Hilltop Technology Services LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5308	FTX Ventures Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5319	FTX Trading Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5323	LedgerPrime Bitcoin Yield Enhancement Fund, LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5324	FTX Property Holdings Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5327	West Realm Shires Financial Services Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5331	North Wireless Dimension Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023

5333	LedgerPrime LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5336	Deck Technologies Holdings LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5339	Quoine Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5345	FTX EU Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5348	Deck Technologies Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5351	FTX US Trading, Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5355	Zubr Exchange Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5360	Paper Bird Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5362	FTX Marketplace, Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5368	Alameda Research LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5373	Alameda TR Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5419	GG Trading Terminal Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5444	FTX Crypto Services Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5445	FTX EMEA Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5446	Cedar Grove Technology Services, Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5448	FTX Digital Assets LLC	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5449	Atlantis Technology Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5450	Blockfolio, Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5451	Technology Services Bahamas Limited	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5452	Mangrove Cay Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5454	LedgerPrime Ventures, LP	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5455	LT Baskets Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023

5456	North Dimension Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5457	West Innovative Barista Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5459	FTX (Gibraltar) Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5460	FTX Services Solutions Ltd.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5461	Euclid Way Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5462	FTX Lend Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5464	FTX Hong Kong Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5465	Alameda Research Holdings Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5466	Hannam Group Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5470	FTX Equity Record Holdings Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5473	Alameda Research Pte Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5474	North Dimension Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5476	Allston Way Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5477	Digital Custody Inc.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5478	Cottonwood Grove Ltd	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5580	FTX Japan Holdings K.K.	Three Arrows Capital Ltd (in liquidation)	6/30/2023
5581	FTX Structured Products AG	Three Arrows Capital Ltd (in liquidation)	6/30/2023